

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

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SEALED

PETER OPPENEER
CLERK US DIST COURT
WD OF WI

UNITED STATES OF AMERICA

INDICTMENT

v.

Case No.

19 CR 136 JDP

LISA XIONG, CHONG CHUENENG
MOUA, CHOU XIONG, SOUA KHANG,
YA YANG, JOHN GATES, CHAI THAO,
SANDY VANG, GER MOUA, VANG C.
YANG, and MENG XIONG

21 U.S.C. § 841(a)(1)
21 U.S.C. § 846
18 U.S.C. § 922(g)(1)
18 U.S.C. § 924(c)

Defendants.

THE GRAND JURY CHARGES:

COUNT 1

1. From on or about November 12, 2018, to on or about June 13, 2019, in the Western District of Wisconsin and elsewhere, the defendants,

LISA XIONG, CHONG CHUENENG MOUA, CHOU XIONG,
SOUA KHANG, YA YANG, and JOHN GATES,

knowingly and intentionally conspired with each other, and with others known and unknown to the grand jury, to distribute and to possess with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

2. With respect to defendant LISA XIONG, the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, was 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine.

3. With respect to defendants CHONG CHUENENG MOUA, SOUA KHANG, and CHOU XIONG, the amount involved in the conspiracy attributable to them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, was 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine.

(All in violation of Title 21, United States Code, Section 846).

COUNT 2

On or about November 12, 2018, in the Western District of Wisconsin, the defendant,

CHAI THAO,

knowingly and intentionally distributed a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1)).

COUNT 3

On or about November 26, 2018, in the Western District of Wisconsin, the defendant,

SANDY VANG,

knowingly and intentionally distributed a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1)).

COUNT 4

On or about November 28, 2018, in the Western District of Wisconsin, the defendant,

SANDY VANG,

knowingly and intentionally distributed 5 grams or more of methamphetamine, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1)).

COUNT 5

On or about November 28, 2018, in the Western District of Wisconsin, the defendant,

SOUA KHANG,

knowingly and intentionally distributed a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1)).

COUNT 6

On or about November 29, 2018, in the Western District of Wisconsin, the defendants,

SANDY VANG and LISA XIONG,

knowingly and intentionally distributed 5 grams or more of methamphetamine, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1)).

COUNT 7

On or about January 16, 2019, in the Western District of Wisconsin, the defendant,

SOUA KHANG,

knowingly and intentionally distributed a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1)).

COUNT 8

On or about January 17, 2019, in the Western District of Wisconsin, the defendant,

SOUA KHANG,

knowingly and intentionally distributed a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1)).

COUNT 9

On or about January 28, 2019, in the Western District of Wisconsin, the defendant,

CHOU XIONG,

knowingly and intentionally distributed 5 grams or more of methamphetamine, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1)).

COUNT 10

On or about January 31, 2019, in the Western District of Wisconsin, the defendants,

CHOU XIONG and LISA XIONG,

knowingly and intentionally distributed 5 grams or more of methamphetamine, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1)).

COUNT 11

On or about February 6, 2019, in the Western District of Wisconsin, the defendants,

CHOU XIONG and GER MOUA,

knowingly and intentionally distributed 5 grams or more of methamphetamine, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1)).

COUNT 12

On or about February 11, 2019, in the Western District of Wisconsin, the defendant,

CHOU XIONG,

knowingly and intentionally distributed 5 grams or more of methamphetamine, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1)).

COUNT 13

On or about February 26, 2019, in the Western District of Wisconsin, the defendant,

CHOU XIONG,

knowingly and intentionally distributed 5 grams or more of methamphetamine, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1)).

COUNT 14

On or about March 4, 2019, in the Western District of Wisconsin, the defendant,

CHOU XIONG,

knowingly and intentionally distributed 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1)).

COUNT 15

On or about March 21, 2019, in the Western District of Wisconsin, the defendant,
GER MOUA,
knowingly and intentionally distributed a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1)).

COUNT 16

On or about March 21, 2019, in the Western District of Wisconsin, the defendant,
GER MOUA,
knowingly and unlawfully possessed a Smith and Wesson .38 caliber revolver, in furtherance of a drug trafficking crime, specifically distribution of a mixture or substance containing a detectable amount of methamphetamine, as alleged in Count 15 of this indictment.

(In violation of Title 18, United States Code, Section 924(c)).

COUNT 17

On or about March 21, 2019, in the Western District of Wisconsin, the defendant,
GER MOUA,
knowing she had previously been convicted of an offense punishable by a term of imprisonment exceeding one year, knowingly and unlawfully possessed in or affecting commerce a Smith and Wesson .38 caliber revolver, said firearm having previously traveled in and affected interstate commerce.

(In violation of Title 18, United States Code, Section 922(g)(1)).

COUNT 18

On or about March 27, 2019, in the Western District of Wisconsin, the defendant,

GER MOUA,

knowingly and intentionally distributed 50 grams or more of a mixture or substance
containing a detectable amount of methamphetamine, a Schedule II controlled
substance.

(In violation of Title 21, United States Code, Section 841(a)(1)).

COUNT 19

On or about April 29, 2019, in the Western District of Wisconsin, the defendant,

CHAI THAO,

knowingly and intentionally distributed 50 grams or more of a mixture or substance
containing a detectable amount of methamphetamine, a Schedule II controlled
substance.

(In violation of Title 21, United States Code, Section 841(a)(1)).

COUNT 20

On or about May 9, 2019, in the Western District of Wisconsin, the defendant,

CHOU XIONG,

knowingly and intentionally distributed 5 grams or more of methamphetamine, a
Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1)).

COUNT 21

On or about May 21, 2019, in the Western District of Wisconsin, the defendant,

JOHN GATES,

knowingly and intentionally attempted to possess with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

(In violation of Title 21, United States Code, Section 846).

COUNT 22

On or about May 25, 2019, in the Western District of Wisconsin, the defendant,

VANG C. YANG,

knowingly and intentionally distributed a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1)).

COUNT 23

On or about May 28, 2019, in the Western District of Wisconsin, the defendant,

MENG XIONG,

knowingly and intentionally distributed a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1)).

COUNT 24

On or about May 29, 2019, in the Western District of Wisconsin, the defendant,

CHOU XIONG,

knowingly and intentionally distributed 5 grams or more of methamphetamine, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1)).

COUNT 25

On or about June 2, 2019, in the Western District of Wisconsin, the defendants,

MENG XIONG and LISA XIONG,

knowingly and intentionally distributed 5 grams or more of methamphetamine, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1)).

COUNT 26

On or about June 3, 2019, in the Western District of Wisconsin, the defendant,

VANG C. YANG,

knowingly and intentionally distributed a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1)).

COUNT 27

On or about June 13, 2019, in the Western District of Wisconsin, the defendants,

CHONG CHUENENG MOUA and LISA XIONG,

knowingly and intentionally possessed with intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1)).

COUNT 28

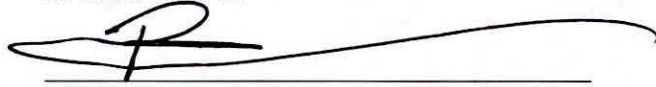
On or about June 13, 2019, in the Western District of Wisconsin, the defendant,

JOHN GATES,

knowingly and intentionally attempted to possess with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

(In violation of Title 21, United States Code, Section 846).

A TRUE BILL



PRESIDING JUROR

Indictment returned:

9/19/19



SCOTT C. BLADER
United States Attorney